

Reza Mirzaie, Esq.
(Pro Hac Vice to be submitted)
rmirzaie@raklaw.com
Paul S. Kroeger, Esq.
(Pro Hac Vice to be submitted)
pkroeger@raklaw.com
Stanley H. Thompson, Jr., Esq.
(Pro Hac Vice to be submitted)
sthompson@raklaw.com
C. Jay Chung, Esq.
(Pro Hac Vice to be submitted)
jchung@raklaw.com
RUSS, AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

Mark Borghese, Esq.
Nevada Bar No. 6231
mark@borgheselegal.com
BORGHESE LEGAL, LTD.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
T: (702) 382-0200
F: (702) 382-0212
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

2-WAY COMPUTING, INC., a Nevada)	Case No.: 2:16-cv-01110-RCJ-PAL
corporation,)	
)	
Plaintiff,)	UNOPPOSED MOTION AND
)	[PROPOSED] ORDER TO EXTEND
vs.)	DEADLINE FOR DEFENDANT TO
)	RESPOND TO COMPLAINT
)	(SECOND REQUEST)
GRANDSTREAM NETWORKS, INC., a)	
Delaware corporation,)	
)	
Defendant.)	

Plaintiff 2-Way Computing, Inc. (“Plaintiff”) hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance with LR IA 6-1 and LR IA 6-2. This is the second request to extend the proposed deadline.

1 The first request for an extension, requesting a fifteen (15) day extension until July 12,
2 2016, was made on June 27, 2016 and has not yet been ruled on by this Court (Docket #8). This
3 second request is for an additional fifteen (15) days (30 days total) until July 27, 2016.

4 This second request is being made after the original June 27, 2016. The failure to file
5 this motion before the deadline was the result of excusable neglect as at the time the original
6 request was made it was not known that the fifteen (15) days in the initial request would be
7 insufficient time to discuss settlement and allow for Defendant to investigate the claims of the
8 Complaint and obtain Nevada counsel.

9 The Complaint (Doc. 1) was filed on May 17, 2016 and was served on Grandstream
10 Networks, Inc. on or about June 6, 2016. The current deadline to respond to the Complaint was
11 June 27, 2016.

12 The parties believe that the litigation of this matter will be best served by allowing thirty
13 (30) days beyond the original June 27, 2016 deadline to discuss possible settlement of this
14 matter and allow Defendant additional time to investigate the claims of the Complaint and
15 obtain Nevada counsel. Because an attorney for Defendant has not made an appearance in this
16 case, Plaintiff files this motion to extend Defendant's deadline as an unopposed motion.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Accordingly, Plaintiff respectfully requests that this Court grant its request to continue
2 the deadline for Defendant to respond to the Complaint until July 27, 2016.

3
4 **BORGHESE LEGAL, LTD.**

5 */s/ Mark Borghese*

6 DATED: July 8, 2016.

7 Mark Borghese, Esq.
8 10161 Park Run Drive, Suite 150
9 Las Vegas, Nevada 89145

10 **RUSS, AUGUST & KABAT**
11 Reza Mirzaie, Esq.
12 Stanley H. Thompson, Jr., Esq.
13 12424 Wilshire Boulevard, 12th Floor
14 Los Angeles, California 90025
15 Attorneys for Plaintiff

16 **ORDER**

17 **IT IS SO ORDERED.**

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: July 20, 2016